

The Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JACKSON, DAWNTE,

Plaintiff,

vs.

KING COUNTY, KING COUNTY ADULT  
CORRECTIONS, and KING COUNTY  
CORRECTION OFFICER D. ECHOLS, KING  
COUNTY CORRECTION OFFICER  
RICHMOND, SERGEANT EDMONDS, JOHN  
DIAZ, OTHER EMPLOYEES, and or  
OFFICIALS and JOHN DOE 1-30), as  
EMPLOYEES) and IN THEIR INDIVIDUAL  
CAPACITIES.) and as,

Defendants.

No. 2:23-CV-00569-JNW

STIPULATION AND AGREED  
~~PROPOSED~~ ORDER TO  
CONTINUE TRIAL DATE AND  
RELATED DATES

**Note on Motion Calendar: 1/10/24**

COME NOW THE PARTIES, by and through their respective counsel, who jointly stipulate and agree as follows:

1. On June 28, 2023, the Court issued an order Setting Trial Date and Related Dates, Dkt. # 15.
2. The Parties are engaged in written discovery. However, counsel for Mr. Jackson was out of the office sick for a couple weeks, and there is still pending a protective order and medical disclosure before discovery can continue, and depositions can be scheduled. Due to these issues, the parties anticipate needing more time to finalize discovery.

STIPULATION AND AGREED ~~PROPOSED~~  
ORDER TO CONTINUE TRIAL DATE AND  
RELATED DATES – 1 (2:23-CV-00569)

**Leesa Manion** (she/her), Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
701 Fifth Avenue, 6<sup>th</sup> Floor  
Seattle, Washington 98104  
(206) 477-1120 Fax (206) 296-0191

3. In order to ensure the Parties' completion of discovery, the Parties therefore stipulate to a one hundred and twenty (120) day continue of the trial date and related dates, as follows:

EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery completed by	January 12, 2024	May 13, 2024
All dispositive motions and motions challenging expert witness testimony be filed by (see LCR 7(d))	February 12, 2024	June 13, 2024
Settlement conference under LCR 39.1, if requested by the parties, held no later than	April 11, 2024	August 12, 2024
All motions in limine must be filed by (see LCR 7(d))	May 1, 2024	September 3, 2024
Deposition Designations must be submitted to the Court by (see LCR 32(e))	May 2, 2024	September 3, 2024
Agreed pretrial order due	May 20, 2024	September 19, 2024
Trial briefs, proposed voir dire questions, and proposed jury instructions must be filed by	May 28, 2024	September 30, 2024
Pretrial conference	June 3, 2024	October 9, 2024
Trial date	June 10, 2024	October 15, 2024

4. Based upon the stipulation and agreements set forth above, the Parties stipulate to the filing of the proposed Agreed Order below.

IT IS SO STIPULATED this 10<sup>th</sup> day of January, 2024:

LEESA MANION  
King County Prosecuting Attorney

By: /s/ Santiago Viola Villanueva  
Santiago Viola Villanueva, WSBA No. 54071  
Senior Deputy Prosecuting Attorney  
701 Fifth Avenue, 6<sup>th</sup> Floor  
Seattle, Washington 98104  
sviolavillanueva@kingcounty.gov  
Attorney for Defendants

STIPULATION AND AGREED ~~[PROPOSED]~~  
ORDER TO CONTINUE TRIAL DATE AND  
RELATED DATES – 2 (2:23-CV-00569)

**Leesa Manion** (she/her), Prosecuting Attorney  
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LAW OFFICES OF OSCAR DESPER III

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Attorney for Plaintiff

STIPULATION AND AGREED ~~[PROPOSED]~~  
ORDER TO CONTINUE TRIAL DATE AND  
RELATED DATES – 3 (2:23-CV-00569)

**Leesa Manion** (she/her), Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
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AGREED ORDER

Pursuant to the Stipulation above, Fed. Civ. R. Procedures 16(b)(4), and LCR 16(b)(6), the Court hereby finds good cause to continue the trial date and related dates in this matter and orders that the trial date and related dates be reset as agreed by the Parties.

DONE this 16th day of January, 2024.



Jamal N. Whitehead  
United States District Judge

Presented by:

LEESA MANION  
King County Prosecuting Attorney

By: /s/ Santiago Viola Villanueva  
Santiago Viola Villanueva, WSBA No. 54071  
Senior Deputy Prosecuting Attorney  
701 Fifth Avenue, 6<sup>th</sup> Floor  
Seattle, Washington 98104  
sviolavillanueva@kingcounty.gov  
Attorney for Defendants

Approved as to form; Notice of Presentation waived:

LAW OFFICES OF OSCAR DESPER III

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[odesper@gmail.com](mailto:odesper@gmail.com)  
Attorney for Plaintiff

STIPULATION AND AGREED ~~[PROPOSED]~~  
ORDER TO CONTINUE TRIAL DATE AND  
RELATED DATES – 4 (2:23-CV-00569)

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